

Six motions were filed by putative class members seeking appointment as lead plaintiff in the above-captioned related securities class actions. *See* ECF 3-8. Pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), district courts are to adopt a presumption that the applicant with the largest financial interest in the relief sought by the class that also satisfies the requirements of Fed. R. Civ. P. 23 is the “most adequate plaintiff.” 15 U.S.C. §78u-4(a)(3)(B)(iii).

Here, while Dang J. Nguyen and his wife suffered more than \$112,000 in losses as a result of defendants’ alleged wrongdoing and satisfies the Rule 23 requirements at this stage, Mr. Nguyen recognizes that they did not suffer the greatest loss. If the Court determines that the movants with greater losses do not satisfy the PSLRA’s requirements for appointment as lead plaintiff, Mr. Nguyen remains ready, willing, and able to fulfill that role on behalf of the class.

DATED: August 22, 2023

Respectfully submitted,

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